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Alliance for Telecommunications
Industry Solutions

*Problem Solvers to the
Telecommunications Industry*

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Testing Committee

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: Ex Parte Presentation In CC Docket No. 95-155, In the
Matter of Toll Free Service Access Codes

Dear Mr. Caton:

At the request of the Federal Communications Commission's ("FCC" or "Commission") Network Services Division, the Alliance for Telecommunications Industry Solutions, Inc. ("ATIS") - sponsored Service Management System ("SMS") Number Administration Committee ("SNAC") provided an update on July 23, 1997 with regard to the efforts of the committee with respect to the deployment of the next toll free resource code - 877. The SNAC is a committee under the auspices of the Ordering and Billing Forum ("OBF"). Representing the SNAC was Don Werner (AT&T). Accompanying Mr. Werner were Susan Miller, ATIS Vice President and General Counsel; and Megan Campbell, ATIS Staff Attorney and Acting Director of the OBF. Participating from the FCC was Kathleen Levitz, Chief, Common Carrier Bureau; Geraldine Matise, Chief, Network Services Division; Anna Gomez, Deputy Chief, Network Services Division; Judy Albers, Senior Attorney, Common Carrier Bureau; and Robin Smolen, Attorney, Common Carrier Bureau.

Mr. Werner reviewed the attached presentation. He highlighted that the current projection for toll free exhaust is now August, 1998. The date had moved up from November, 1998. Mr. Werner also reported that at its August meeting, the SNAC would be addressing a recommendation on how to address 877- 555, that is whether the codes should be opened or set aside. He covered a number of other items to be addressed at the SNAC meeting, including the committee's work to incorporate specifics from the FCC's Second Report And Order And Further Notice Of Proposed Rulemaking, In the Matter of Toll Free Service Access Codes, CC Docket No. 95-155, Adopted: April 4, 1997; Released: April 11, 1997 into the Industry Guidelines for Toll-Free Number Administration as well as

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0 & 1



William F. Caton

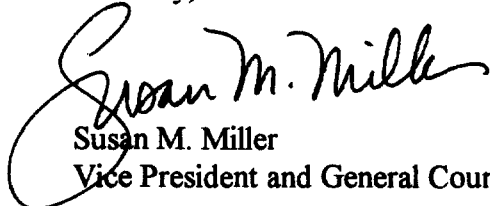
July 30, 1997

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SCP ready dates, the set aside of 888-250 test numbers and 877-250 test numbers, and the update of the SNAC 877 Network Implementation Plan.

If you have any further questions regarding this presentation, please call me at (202) 434-8828.

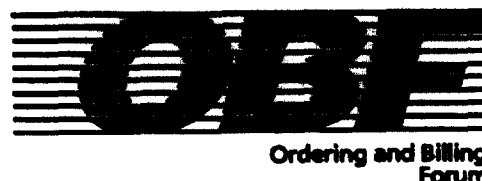
Sincerely,



Susan M. Miller

Vice President and General Counsel

cc: Kathleen Levitz, Chief, Common Carrier Bureau
Geraldine Matise, Chief, Network Services Division



DISCUSSION TOPICS - July 23, 1997

1. Review/Update of March 12, 1997 Presentation.
2. Current Utilization of Toll-Free Resource (800 & 888) (As of 7/19/97)

	In Use	Spare	Total
800#s	7,706,926 (99.96%)	3,074	7,710,000
888#s	<u>4,551,206</u> (57.03%)	<u>3,428,794</u> (42.97%)	<u>7,980,000</u>
	12,258,132 (78.13%)	3,431,868 (21.87%)	15,690,000

Current Projection for Toll-Free Exhaust - August, 1998

3. Current # of Responsible Organizations (RESPORGs) Approx. 190.
4. Planned Activities for SNAC August meeting.
 - ▶ Develop recommendation for 877-555. (Open in 800, set aside in 888 per FCC Order.)
 - ▶ Incorporate specifics from FCC Order into "Industry Guidelines for Toll-Free Number Administration".
 - ▶ Replication within 877 - Continued consensus for no replication (Issue is managing who has "right of first refusal") (Approximately 373,000 "Y" factor numbers in 888).
 - ▶ Disconnected/Reassigned 800 Numbers with 888 equivalent "set aside".
 - ▶ SCP Ready Date.
 - ▶ 888-250 Test Numbers (0000-1499 Reserved, 1500-9999 General Availability).
 - ▶ 877-250 Test Numbers (Proposed 0000-1499 be reserved, 1500-9999 be released for General Availability).
 - ▶ Update "SNAC 877 Network Implementation Plan".



**SMS/800 NUMBER ADMINISTRATION COMMITTEE
("SNAC")**

**UPDATE OF THE
MARCH 12, 1997 PRESENTATION**

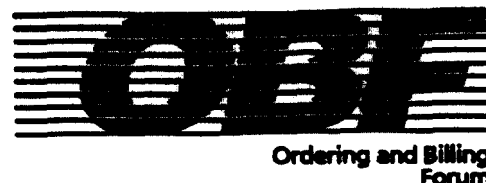
**before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

JULY 23, 1997

Prepared By:

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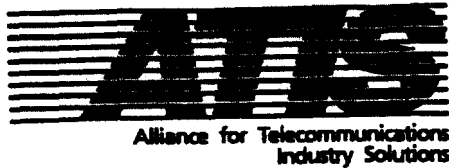
SMS/800 NUMBER ADMINISTRATION COMMITTEE ("SNAC")

PRESENTATION OF THE 877 IMPLEMENTATION PLAN

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ATTACHMENTS



I. Who Is The SMS/800 Number Administration Committee? ("SNAC")

MISSION: The SNAC identifies, develops and implements the resolution of issues focused on the support of the 800/Service Management System (SMS).

Responsibilities:

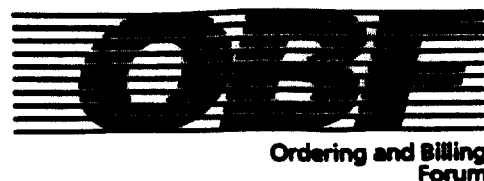
- SMS/800 Process Enhancements
- Customer/RESP ORG Requirements
- Provider/RESP ORG Requirements
- Technical/Operational Issues
- SMS/800-888 Documentation Requirements
- NASC (Number Administration Service Center)/RESP ORG Support Processes

Additional responsibilities include maintenance of certain documents to support the database administration process, which outline:

- RESP ORG Responsibilities
- 10-Digit Toll Free Number Administration
- Coordinated Conversion of 800 Database Services
- NASC Responsibilities Support Processes

II. SNAC has been “monitoring” toll free number utilization to ensure timely implementation of 877 as the next resource.

- 888 Implemented March 1996 (Approx 50% of resource in use).
- Issue 1300 Initiated By SNAC August 1996 to begin implementation planning for 877.
- Projecting future exhaust of existing resource involves analysis of three key elements:
 - ➔ Current utilization reports (Provided by DSMI).
 - ➔ “Toll Free Resource Exhaust Relief Planning Guidelines” developed by Industry Numbering Committee (INC 96-0802-014, Issued August 2, 1996).
 - ➔ ~~FCC designated 888 allocation (633,251 monthly).~~
- Based on number utilization, exhaust of current toll free resources is projected:
 - ➔ ~~Based on FCC allocation - as early as November 1997.~~
 - ➔ Projected on current utilization - approximately November ~~August~~ 1998.



III. SNAC PROPOSALS:

- Implementation of 877 - Saturday, April 4, 1998
- Start 877 reservations - Saturday, April 4, 1998
- First customer in service - Saturday, April 4, 1998
- No replication set aside (All numbers available)

IV. SNAC reviewing changes to “Industry Guidelines For Toll Free Number Administration.”

- Reservation limit change per FCC Order
- Outline process for conservation measures (August, 1997 meeting)
- Disconnect timeframes for customized referrals (August, 1997 meeting)

V. LEC 877 CONSIDERATIONS (As outlined in “The National LEC “8XX” Planning Document”, Issue 1, August 1996).

- SMS/800 Readiness - June, 1997¹
- Switches - 877 Incorporated with 888
- STPs - Supports all 8XX codes
- SCPs - Software supports 8XX
 - ➔ 877 testing required
 - ➔ Capacity upgrade required
 - ➔ Expected completion 3rd Quarter 1997
- Regulatory Issues
 - ➔ Concerns on CC Docket No. 95-155
 - ➔ Industry identification/implementation of new code prior to exhaust
 - ➔ Impacts finalization of network plan

¹ Updated from Plan



V. LEC 877 CONSIDERATIONS (As outlined in "The National LEC "8XX" Planning Document", Issue 1, August 1996). - Continued

- Industry issues - recognizes roles of:
 - SNAC
 - INC
 - NIIF/NIM Committee (formerly NOF)
(Issue accepted September 9, 1996)

VI. Industry Notification

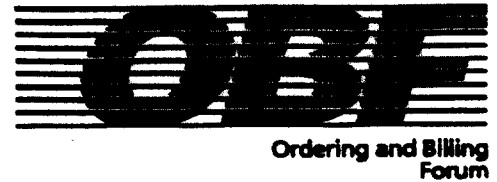
- Client Service Bulletins through SMS/800 to all RESPORGS
- SNAC Participants/Mailing List
- This Presentation
- ATIS developed news releases

VII. Concerns outside the scope of SNAC:

- “Customer/Consumer Education”
 - ➔ Responsibility of 800 Service Providers
- Payphone readiness (some still not handling 888)
- PBX readiness
- Allocation
- 888 “Y” Factor

VIII. 866 deployment projected for sometime after the year 2000:

- Considerations:
 - ➔ May require AIN deployment
 - ➔ Some switches will require software upgrades
 - ➔ SCP upgrades will be required



ATTACHMENTS

- 1) OBF/SNAC Issue 1300 - "877 Implementation"
- 2) The SNAC 877 Network Implementation Plan
- 3) "Toll Free Resource Exhaust Relief Planning Guidelines" developed by The Industry Numbering Committee ("INC")
- 4) "Industry Guidelines for Toll Free Number Administration"
- 5) February 13, 1997 Letter - SMS/800 Services to SNAC Co-leaders with correspondence from the FCC to DSMI dated May 10, 1996
- 6) National LEC "8XX" Planning Document, Issue 1, August 1996 (no new releases).
- 7) NIIF/NIMC Issue 19 - "877 Toll Free Implementation Test Plan"

Ordering and Billing Forum Issue Identification Form

OBF Issue Number	1300
Date Submitted	7/18/96
Date Accepted	8/29/96 at OBF #55
Initial Closure	2/5/97 at OBF # 57
Final Closure	at OBF #
Issue Category	Active

Part A, Page 1

Issue Title: 877 Implementation

Issue Statement:

In the absence of a reporting mechanism and schedule to begin work on the next toll free SAC, the SNAC needs a plan to coordinate inter and intra committee work to implement 877 and future 8XX codes for toll free numbers efficiently. The plan should allow time to ensure that service is test completed without deficiencies (PBX, ICO, payphone issues, etc.)

Impact of Other Issues or Procedures: None Identified

Desired Results:

It is imperative that there is adequate time for inter committee coordination, planning, test and turn up of SACs for toll free numbers. Codes should be implemented so that there is no difference in the level of service provided to end user customers and end user callers. In order to implement the next SAC in such a fashion, planning should begin now.

Committee Assignment: SMS/800 Number Administration Committee (SNAC)

Associated Committee:

Issue Champion: Jonnie Bond

Company: AT&T

Address: 4565 Blake Road
Seville OH 44273

Telephone: 330-769-3317

Ordering and Billing Forum Issue Identification Form

OBF Issue Number	1300
Date Submitted	7/18/96
Date Accepted	8/29/96 at OBF #55
Initial Closure	2/5/97 at OBF #57
Final Closure	at OBF #
Issue Category	Active

Part A, Page 2

Issue Title: 877 Implementation

Type of Issue:

MGI _____ User Documentation X Other _____
Hardware X Bill/800 System X SCP/Interface X
Software X SMS/800 X On-Line _____
NASC Procedures X

Associated MR #:

Resolution:

The SNAC created the 877 Implementation Plan (See Attached).

Ordering and Billing Forum Issue Identification Form

OBF Issue Number	1300
Date Submitted	7/18/96
Date Accepted	8/29/96 at OBF #55
Initial Closure	2/5/97 at OBF #57
Final Closure	at OBF #
Issue Category	Active

Part B, Page 1

Issue Title: 877 Implementation

Status History:

08-27-96 It was agreed to accept this issue.

10-22-96 This issue will remain in active status. SNAC defined dates for the activities on the draft 877 implementation plan that are applicable to this committee. The SNAC Co-Leaders will follow up on SNAC correspondence to the NOF and with the SMT (National LEC 8XX Product Team) on dates for their activities.

2-5-97 It was agreed to move this issue to initial closure with the understanding that some information outside the scope of this committee has been benchmarked and that that information will be received prior to OBF 58.

The SNAC 877 Network Implementation Plan

OB 57 Initial Closure Draft

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1.0 Introduction

In mid-1994, the industry realized that the national database of 800 numbers administered by the SMS/800 was running out of available numbers. The rate at which new 800 numbers were being assigned was significantly higher than had been previously projected. In August, 1994, the North American Numbering Plan Administrator (NANPA) requested that the Industry Numbering Committee (INC) consider the rapid depletion of numbers and determine what, if any, corresponding action should be taken. The INC accepted the request and began evaluating the situation. Initial reviews indicated that the numbering resource that the SMS/800 system currently manages would exhaust between late 1995 and early 1996. The INC determined that additional numbering resources would be needed to meet the future demand for 800 service.

On January 15, 1995, the INC designated "888" as the new code (with 877, 866, 855 etc. to also be reserved for use after 888). On March 1, 1996 the 888 toll free code was rolled out.

In mid-1996, the industry began preparation for the next toll free code, "877". This plan outlines the major activities that need to take place in order to successfully implement the 877 toll free code for service availability by April 4, 1998. Service Availability should be perceived to mean that the vast majority of customers have service from a majority of the North American locations as of April 4, 1998.

2.0 Background

To date, 800 and 888 are the only toll free SACs available in the SMS/800 for Called Party Pay number assignments. When portability re-engineered the 10 digit number assignment process through SMS, most 800 NXX codes were already available for assignment. As 800 exhaust drew closer, new 800 NXX codes were opened on an availability scheduled date, but system impacts were minimal because of the size of the pool of new numbers opening up (1 NXX = 10,000 numbers) and customer impacts were minimal because of the uniqueness of the resource assignment (no Y factor impacts).

With the opening of new toll free SAC codes, the resource pool availability is vastly improved to the tune of 7.9 million numbers with each new SAC. Due to the uniqueness of the situation (Y factor and brand protection issues) when coupled with the expected rush to meet customer expectations (get the "good numbers"), system and customer impacts need to be addressed.

The desired results were for the Industry to minimize system and customer impacts by establishing a Toll Free SAC Implementation Plan. This plan will address possible customer confusion and allow for the continued provision of world class communication services in the toll free arena.

4.0 PROJECT TRACKING

This group of activities outlines the scope of the 877 Project Implementation schedule from a scheduling and Industry coordination perspective.

TASK # 1: Project Tracking Activities

SNAC Issue 1300: 877 Implementation was accepted for work on August 27, 1996. August 27, 1996 marks the approximated project tracking "begin date".

TASK # 2: Full 877 Data Base Access Service

The official end date for 877 Implementation, meaning that 877 routing and "full service" has been achieved. For the 877 toll free SAC, the expected full 877 data base access service date is April 4, 1998.

TASK # 3: Industry Forum Coordination

Industry Forum Coordination is a summary activity specifically defined to incorporate Task # 4 and Task # 5.

TASK # 4: Industry Forum Coordination Letter

Related issues and cooperation between other Industry Forums (e.g., INC, NIIF, ASR) may be necessary throughout 877 implementation.

TASK # 5: Network Issues Resolved by NOF/NIIF

Although it is not expected that 877 will have major network impacts, the NOF (NIIF as of January 1, 1997) is separately identified for their key contributions in network certification. It is expected that this certification will be received prior to the April 4, 1998 "in service" date.

TASK # 6: Testing Coordination

Testing Coordination is a summary task detailing Task # 7 and Task # 8.

TASK # 7: Testing Coordination Activities

Testing (including software and network testing) is performed by IXC's, ECs, DSMI, and RESP ORGs.

TASK # 8: Industry Go/Hold Date

A Go/No Go date of January 31, 1998 is targeted to review testing progression and associated details to ensure a successful implementation.

6.0 SNAC ACTIVITIES

TASK # 17: SNAC Activities

SNAC activities include Tasks 18-23.

TASK # 18: 877 Implementation Issue Accepted

SNAC Issue 1300: 877 Implementation was introduced and accepted at OBF #55 in August, 1996.

TASK # 19: LEC 877 Test Plan Walkthrough

TASK # 20: Evaluate Need to Develop Initial Load Process (Y Factor)

If there is a need, the SNAC defines process requirements for loading Y Factor 877 numbers and provides those requirements to Bellcore.

TASK #21: Industry Guidelines Review/Revision

SNAC will readdress the *Industry Guidelines for Toll-Free Number Administration* considering any related FCC activities.

TASK # 22: 877 SMS/800 Release

The SMS/800 General Availability (GA) date represents the date that the SMS/800 software to support the new code will be moved into the SMS/800 production system in Kansas City as fully tested and operation ready. 877 Code Activity for reservations and subsequent activations are defined as separate activities and do not begin on the SMS/800 877 Release GA date.

TASK # 23: Evaluate 877 Restrictions

The SNAC will evaluate whether restrictions in 800 and/or 888 should be applied to the 877 SAC.

7.0 SCP OWNER/OPERATOR ACTIVITIES

TASK # 24: SCP Owner/Operator Activities

SCP Owner/Operator Activities include Tasks 25-30.

ICCF

INDUSTRY CARRIERS COMPATIBILITY FORUM

UNDER THE AUSPICES OF THE CARRIER LIAISON COMMITTEE

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Toll Free Resource Exhaust Relief Planning Guidelines

These guidelines are issued in connection with
the resolution of INC Issue #055.

INDUSTRY NUMBERING COMMITTEE

TOLL FREE RESOURCE EXHAUST PLANNING GUIDELINES

1. Introduction

This document is to be used for forecasting the months to exhaust of the current toll-free Naps. The months to exhaust will, in turn, trigger an announcement to the industry of the relief NAP and the date it will be available. All references to number(s) or NAP(s) in this document are toll-free number(s) or NAP(s).

According to Section 2.4, Service Management System For 800 Numbers, of the OF/SAC Guidelines toll free numbers fit into one of nine categories:

NNX Not Open	Spare	Reserved
Assigned	Working	Disconnect
Transitional	Suspend	Unavailable

Spare numbers are defined as follows - The 800 Number is available for assignment by a REPS OR.

The other eight status's for numbers are for those numbers that are unavailable for assignment. This forecast will estimate the months to exhaust of the Spare numbers.

There are two factors used in estimating the months to exhaust. The first is the actual monthly average demand which is provided by DIMS. The second is an estimated monthly accelerated demand which is determined by the OF SAC with input from DIMS.

The forecast model uses the actual average demand and the estimated accelerated demand to estimate the months to exhaust of the spare numbers.

DIMS will run the forecast model periodically. When the months to exhaust equals 40, DIMS will run the model monthly. When the months to exhaust equals 30 the industry will announce that the new NAP will be available in 27 months.

Section 2 of these guidelines gives an example of the forecast model using fictitious numbers. Section 3 provides definitions for the items in the forecast model. The items in the model have one of three sources; they are provided by DIMS, provided by the industry, or are derived from two other values in the model.

2. Forecast Model Example

	ITEM	Value Provided by DSMI Report	Value Provided in this Document	Formul a	Derived Value
1.	Spare	8,000,000			
2	Average Demand	100,000			
3.	Accelerated Demand		200,000		
4.	Months of Accelerated Demand		10		
5.	Total Quantity of Accelerated Demand			3X4	2,000,000
6.	Average Demand Pool			1-5	6,000,000
7.	Months of Average Demand			6/2	60
8.	Months to Exhaust			4+7	70

Step 1 The quantity of spare numbers provided by DSMI is 8,000,000.

Step 2 Average demand as provided by DSMI is 100,000 numbers a month.

Step 3 The OBF SNAC with input from DSMI has determined that 200,000 should be used as an estimated monthly accelerated demand.

Step 4 The OBF SNAC with input from DSMI has also determined that 10 months should be used as the estimated number of months there will be accelerated demand during the remaining months to exhaust.

Step 5 The total quantity of numbers used during the estimated 10 months of accelerated demand is 2,000,000. (10 months X 200,000)

Step 6 The spare numbers minus the total accelerated demand equals the total quantity of numbers used during the months of average demand.
(8,000,000 - 2,000,000 = 6,000,000)

Step 7 The average demand pool divided by the average demand will give the number of months of average demand. (6,000,000 / 100,000 = 60)

Step 8 The number of months of average demand plus the estimated number of months of accelerated demand equals the total months to exhaust. (60 + 10 = 70)

Since there is an estimated 70 months to exhaust, the projected announcement date of the new NAP is 40 months away. The new NAP would be available for assignment to REPS ORS 27 months after the announcement date.

3. Explanation of Forecast Model

1. **Spare** - This is a value tracked monthly by DIMS.

Spare = value provided monthly by DIMS

2. **Average Demand** - The Average Demand is the actual average demand provided monthly by DIMS.

Average Demand = value provided monthly by DIMS monthly

3. **Accelerated Demand** - Accelerated Demand is an estimate provided by the OF SAC with input from DIMS of demand for numbers during a month when there is higher than average demand. This number is used to add a factor above average demand such as would be expected as the current resource is exhausting. One method of deriving the accelerated demand is to use historical data. Examples of this are the average of the previous 10 high months or average of the 5 previous high months.

Accelerated Demand = provided by OBF SNAC with input from DSMI

4. **Months of Accelerated Demand** - This is an estimate provided by the OBF SNAC with input from DSMI of the number of months there may be accelerated demand as per item 3.

Months of Accelerated Demand = provided by OBF SNAC with input from DSMI

5. **Total Quantity of Accelerated Demand** - This value is derived by multiplying the quantity of accelerated demand by the months of accelerated demand. This will give the total quantity of numbers utilized during the estimated periods of accelerated demand.

Total Quantity of Accelerated Demand = months of accelerated demand X accelerated demand =

6. **Average Demand Pool** - The average demand pool is the quantity of numbers used during the periods of average demand. This is derived by subtracting the total quantity of accelerated demand from the spare numbers.

Average Demand Pool = Spare Numbers - Total Quantity of Accelerated Demand

7. **Months of Average Demand** - The months of average demand is derived by dividing the average demand pool by the average demand.

Months of Average Demand = Average Demand Pool / Average Demand

8 . Months to Exhaust - The months to exhaust is derived by adding the months of average demand to the months of accelerated demand.

Months to Exhaust = Months of Average Demand + months of accelerated demand

Announcement Date - The announcement date is the date that the industry announces the relief NAP and its availability date. The announcement is triggered when the Months to Exhaust = 30.

Announcement Date = The date that Months to Exhaust = 30

Availability Date - The availability date is the date that the relief NAP will be able to be disabled by end users. The availability date is 27 months after the announcement date. The twenty seven month network preparation interval used in this document was developed using the most current information available at the time and is subject to change. This interval should be adjusted as vendors and service providers develop additional network capabilities for activating subsequent toll free Naps.

Availability Date = Announcement Date + 27 Months